




CANCER PREVENTION & RESEARCH
INSTITUTE OF TEXAS

CPRIT Grantee Annual Compliance Training

June 2023

Academic Research

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Training Overview


- Introductions
- FWA Reporting
- Recent Administrative Rule Changes
- Policies and Procedures Guide Overview
- Required Reporting
- Programmatic Topics



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Sources of CPRIT Grantee Requirements


- Article III, Section 67 Texas Constitution
- Texas Health & Safety Code Chapter 102
- Texas Administrative Code Chapters 701 - 703
- Grant Contract
- Texas Grant Management Standards (formerly Uniform Grant Management Standards)

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CPRIT Policies and Procedures Guide Chapters Covered Today

Chapter	Topic
5	Grant Contracts
6	Required Grant Reports
9	Allowable Costs
10	Grantee Budget/Expense Categories and Required Documentation
13	Termination, Extension, and Closeout of Grant Contracts



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Fraud, Waste, & Abuse



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Fraud, Waste, & Abuse

How do I Make a Report?
Use Client Code #5124633190
(Users can remain anonymous)

Call

1-877-64-RedFlag
(1-877-647-3335)

Online

www.RedFlagReporting.com



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Fraud, Waste, & Abuse

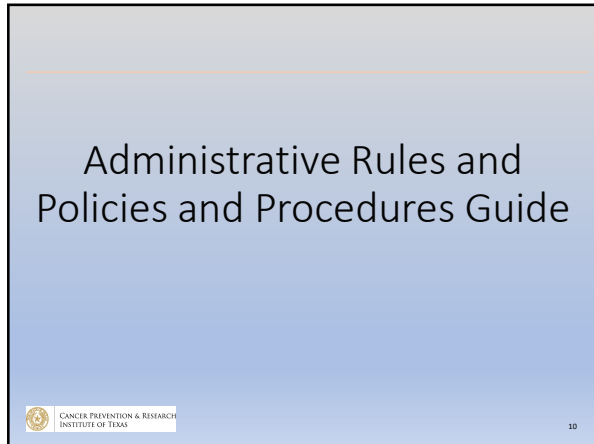




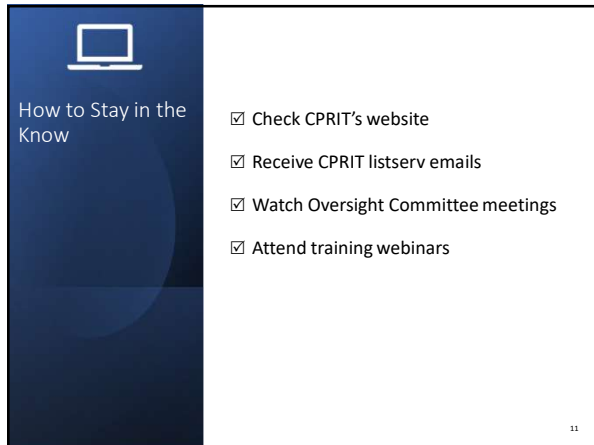
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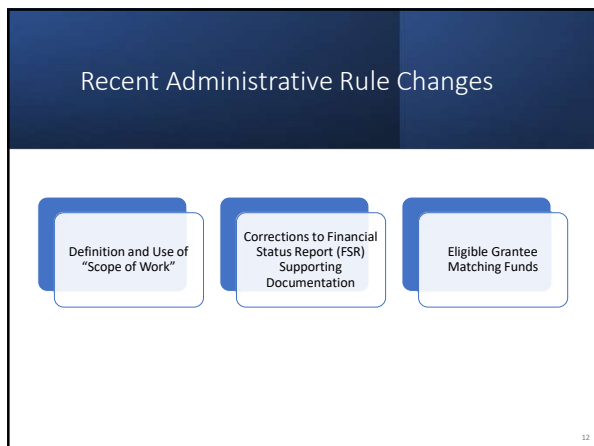
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Definition of "Scope of Work"

§ 701.3(63)


Proposed rule change

Public comment period is open.

- Scope of Work: the goals and objectives or specific aims and sub aims, if appropriate, of the Cancer Research or Cancer Prevention project, including the timeline and milestones to be achieved.
- RFA will specify applicable terminology for a grant mechanism.



Public comment period is open through July 3rd.



The Oversight Committee will consider final adoption at the August 16th meeting.

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Use of "Scope of Work"

§§ 701.3(29), 703.6, 703.7, 703.10, 703.21, 703.25


Proposed rule change

Public comment period is open.

- These are non substantive changes that ensure consistent use of "Scope of Work" in CPRIT's rules.



Public comment period is open through July 3rd.



The Oversight Committee will consider final adoption at the August 16th meeting.


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Corrections to Financial Status Report (FSR) Supporting Documentation

§703.24(a)(5)

Adopted & final in 2022

Requires a grantee to submit corrections to FSR supporting documentation within five (5) business days after CPRIT makes the request.



If a grantee does not meet the deadline, then CPRIT may disapprove the FSR.

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Eligible Grantee Matching Funds

§ 703.11(c)(7)

Adopted & final in 2022

- Adds relocation costs to Texas as a source of encumbered funds that a grantee may use to fulfill their matching funds requirement.

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Grant Policies and Procedures Guide

A resource for CPRIT grant applicants and grant recipients.

June 2022

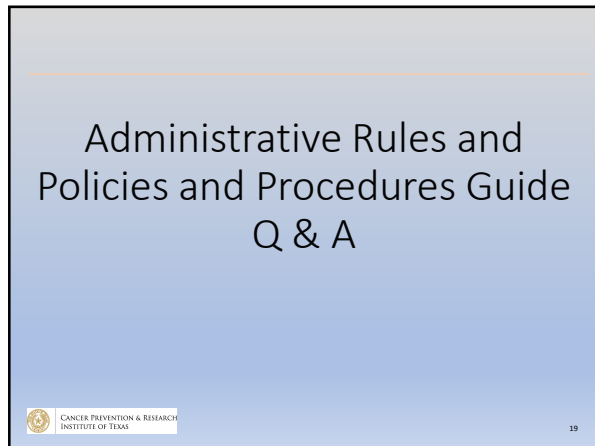
Policies & Procedures Guide Overview

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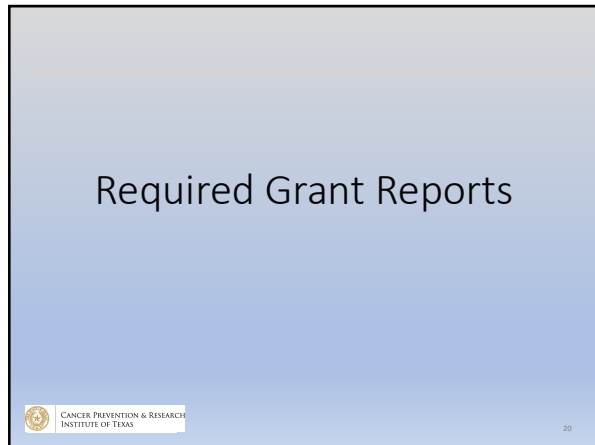
CPRIT's website is the best place to find the current rules and P&P Guide

<https://cprit.texas.gov/about-us/statute-rules-and-grant-policies-guide/>

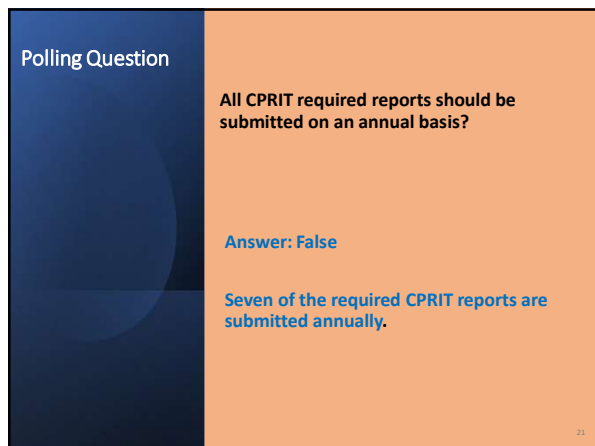
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Reporting Requirements



Annual

- Inventory Report
- Revenue Sharing Report
- HUB/Texas Suppliers Report
- Matching Compliance Certification
- Annual Progress Report
- Single Audit Determination Form
- Audit Report



Quarterly

- Financial Status Report
- Quarterly Progress Report

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Progress Reports



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Progress Reports

Ensure that Progress Reports contain accurate and complete impact data.

This includes, but is not limited to:

- All Publications (manuscripts to published)
- Follow-on funds
- Patents and Patent Applications
- Clinical trials
- Core Facility Support Award user data
- Research training award data




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Progress Reports

- Economic Impact (*Prevention Grants only*)
 - How many NEW jobs were created = the number of positions filled during the last year (including the final report; final report should NOT be the cumulative number over the entire project). This number should be ZERO if positions haven't been added during the grant year
 - How many jobs were maintained = the number of positions that continue from the year



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Progress Reports
– Common Errors

Incomplete report

Overlap with previous reports

Duplicate entries (publications, jobs, etc.)

Inconsistencies between narrative and data entered

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CPRIT
Acknowledgment

Printed and visual materials related to CPRIT funding should include CPRIT acknowledgment and grant ID.

Publications not funded by CPRIT, should not be included in the progress report

RR grants only - Recruitment awardees are expected to report on all cancer-related publications

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CPRIT Acknowledgment


Funding

This work was conducted with support from [redacted] Cancer Prevention Research Institute of Texas (CPRIT) RP150587. [redacted] was supported by a Career Development Award (CDA 11-217) from the U.S. Department of Veterans Affairs. The content is solely the responsibility of the authors and does not necessarily represent the official views of the National Institutes of Health.

P&P Guide Reference:
5.10 Acknowledgement of CPRIT Funding

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Financial Status Report (FSR)



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Polling Question

A justification memo or letter should be included with the FSR supporting documentation for expenses submitted "outside the period".

Answer: True

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Polling Question

How many days does a grantee have to respond to a request for additional FSR documentation?

A. 21 days
B. 5 days
C. 30 days

Answer: B

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FSR – Due Dates

Fiscal Quarter/ Reporting Period	FSR Due Date	Last Day of Grace Period
Sept 1 – Nov 30	Feb 28	Mar 30
Dec 1 – Feb 28	May 29	June 28
Mar 1 – May 31	Aug 29	Sept 28
June 1 – Aug 31	Nov 29	Dec 29

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FSR Review and Approval Process

```
graph TD; A[Submit FSR in CGMS] --> B[Grant Accountant (GA) Review]; B --> C[2nd Level Review]; C --> D[FSR Approved in CGMS by GA];
```

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FSR Required Supporting Documentation

Every Financial Status Report (FSR) must include a summary report of expenses generated directly from an accounting system or itemized on an **Excel spreadsheet**, as well as documentation to support grant costs paid during the current reporting period.

The report must contain the following information:

- expense categories
- itemized expenses
- description of items
- date paid
- amount paid with expense totals broken down by category

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FSR Required Supporting Documentation

If the date paid is not found in the summary report, it should be noted on invoices.

A payment claimed for a period prior to the current period should be accompanied by an **Out of Period (OTP)** letter or memo explaining why the payment was not claimed in the appropriate period.

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FSR Support Documentation Resources

 FSR Required Supporting Documentation by Expense Category


Details the documentation a grantee must provide to support expenses reported for each budget category


 CPRIT FSR Checklist


A tool to assist grantees submit accurate information and documentation for all costs requested for reimbursement.


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FSR Submissions Checklist

Expenses are paid within FSR period

Payment date is included for all transactions

FSR amounts match ledger totals by expense category


Supporting documents are scanned in the same order as the transaction listing


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FSR Submissions Checklist

Supporting documents are legible

Invoice amounts match amounts shown on the ledger and partial charges are explained on the invoice

Expenses are allowable and properly categorized

A memo justification for cost out of period is provided

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FSR – Examples of Unallowable Costs


INDIVIDUAL
PROFESSIONAL
MEMBERSHIP FEES


ALCOHOL


TIPS & GRATUITIES


BAD DEBT


LOBBYING COSTS


ENTERTAINMENT

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Common FSR Review Issues

Mis-categorization of expenses

Reimbursement amount is not clear

Documents are not clearly labeled

Invoices lack detailed purchase description

Lack of response from grantee for additional information

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Mis-categorization of Expenses

- Expense mis-categorization is most common in these three budget categories;
 - Supplies
 - Other
 - Equipment
- Ensure that your budget justification allocates expenses to the appropriate budget category.

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The FSR was submitted with \$88,645.78 in expenses classified as "Other." After reviewing the supporting documents, it was determined that \$40,700.26 should be allocated to "Equipment," \$44,165.52 should be allocated to "Supplies," and \$3780 should be allocated to "Other."

Pay Date	Desc	Budget Category (BOS)	Dept	Fund	Line	Project	Document	Expended	Pay Period/Date	Amount	Invoice Date	Line Item #
11/1/2022	MIS \$04 OT CHARGES	OT Other	01	Maintenance & Operation	42344	10000	07742	177002-1810	40,700.26	MIS \$04 MONTHLY CHARG	11/1/2022	773324
11/1/2022	MIS \$04 OT CHARGES	OT Other	01	Maintenance & Operation	42344	10000	07742	177002-1810	47,945.52	MIS \$04 MONTHLY CHARG	11/1/2022	773324

Budget Categories		
1	Salary	\$39,237.09
2	Fringe	\$15,619.54
3	Travel	\$0.00
4	Equipment	\$40,700.26
5	Supplies	\$44,165.52
6	Contractual	\$0.00
7	Other	3,780
8	Indirect Costs	\$7,269.39
Total		\$145,727.80

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Other Category Expenses

- Printing and reproduction expenses
- Gift or gas cards
- Publication fees
- Equipment warranties and service contracts
- Conference/registration fees
 - *Conference and seminar registration fees should be reported in the "other" category when incurred by the institution/organization or when paid by an employee, but employee is not requesting travel reimbursement.*
- Postage and shipping services (FedEx, UPS), etc.

P&P Guide Reference:
10.8 Other Expense Category



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Equipment Category Expenses

- Equipment with unit cost of \$5000 or more


P&P Guide Reference:
12.4.4.7 Equipment

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Reimbursement Amount Not Clear

- Identify the amount charged to CPRIT when less than invoice amount.

Item Total	USD	3,430.00
Gross Value		3,430.00
Net Value		3,430.00
Shipping Fees		14.52
Total Solution Cr.		1,166.00
Amount Paid	USD	2,278.52
<div>\$2,000 charged to CPRIT award</div>	Credit Card Charge Details: MC ****5345	USD 2,278.52

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Lack of response from grantee for additional information

TITLE 25
PART 11
CHAPTER 703
RULE §703.24

Texas Administrative Code

HEALTH SERVICES
CANCER PREVENTION AND RESEARCH INSTITUTE OF TEXAS
GRANTS FOR CANCER PREVENTION AND RESEARCH
Financial Status Reports


(5) The Institute may request in writing that a Grant Recipient provide more information or correct a deficiency in the supporting documentation for a Financial Status Report. If a Grant Recipient does not submit the requested information within five (5) business days after the request is submitted, the Financial Status Report may be disapproved by the Institute.

TAC §703.24 (a)(15)

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Financial Status Reports
Q & A




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Personnel / Fringe Expense
Category



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FSR Personnel & Fringe

- Payroll ledger included and it ties to GL
- All employees are listed on PLOE with Level of Effort for current award year
- Fringe expenses are listed by category for each employee
 - **Exception:** A copy of the agreement that describes the categories of fringe included in the pool must be provided if a grantee uses pooled fringe in accordance with a federally approved rate agreement.

Best Practice



- ①
- ②
- ③




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Personnel Level of Effort (PLOE)



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Polling Question

The personnel level of effort (PLOE) form should be updated once a year.

Answer: False

The PLOE should be updated quarterly before submitting the FSR.

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Polling Question

Do employees whose salaries and fringe are charged to the grant need to be listed on the PLOE?

Answer: Yes

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PLOE Checklist

- PLOE must be updated prior to submitting FSR
- Each employee with salary/fringe has Level of Effort for current award year
- All employees with travel, tuition, stipends and conference fees are listed on the PLOE

Best Practice

P&P Guide Reference:
5.5.8 Personnel Level of Effort Form

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PLOE Checklist

PLOE change requests contain all the following elements:

- type of appointment (number of months)
- % effort
- justification for the change


Enter information for all 3 categories

P&P Guide Reference:
5.5.8 Personnel Level of Effort Form


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- Update PLOE prior to submitting FSR
- When grant moves to closeout status
 - PLOE cannot be revised in CGMS
 - Expenses related to personnel not updated on the PLOE **will not be reimbursed**

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Personnel Level of Effort
Q & A

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Travel Expense Category

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Polling Question

International travel requires prior approval if it is not included in the original budget justification.

Answer: True

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Polling Question

Should meal receipts be submitted if claiming per diem?

Answer: No

Meal receipts are not required when claiming per diem

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Travel Expense Report Requirements

For each trip taken, a separate travel expense report with all supporting documentation should be submitted, which should include:


- Grantee Name
- Traveler's Name
- Date(s) of travel
- Purpose of the travel
- Itemization of expenses
- Proof of payment

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Travel Expense Checklist




All travelers **must** be listed on the PLOE




Receipts should be legible and in same order as GL



Unless using per diem, meal expenses should be supported by itemized receipts.



Clearly identify meals for reimbursement on split receipts



Group and day trip meals are not allowed

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Travel Expense Checklist



Grantee **must** include documentation of CPRIT approval for all international travel expenses



GSA rate printout for the travel location(s) zip code should be attached



Mileage calculations and transportation receipts included



Gratuities and alcohol should be excluded



Meals and lodging expenses are within GSA limits




Include a calculation to show that hotel room rates and taxes are prorated when they exceed the per diem

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Conference and Seminar Registration Fees

- Employees who pay the registration fees and incur travel expenses to attend a conference/seminar can report the fees on their travel reimbursement voucher.



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Texttravel – Hotel Occupancy taxes Maximum Reimbursement

Fiscal Management

Grant Manager
Texas Comptroller of Public Accounts

About FHX

Topics

Systems

Calendars/Schedules

Policies/Procedures (FPP)

Forms

Publications

Training

Home

Travel

Home

Rates

Transportation

Meals and Lodging

Exceptions

Miscellaneous Provisions

Examples

Documentation Required

Meals and Lodging

Meals

Lodging

Hotel occupancy taxes

Exception for employees of educational organizations

Exception for certain state officers or employees

Exception for travel outside

Hotel occupancy taxes

Maximum reimbursement

When a state employee is entitled to be reimbursed for payment of a hotel occupancy or similar tax and the lodging amount incurred exceeds the maximum allowable lodging rate, the following calculation methods for the tax reimbursement must be used:

If the tax is calculated as a percentage of the lodging rate, then the amount of the reimbursement is equal to the percentage multiplied by the maximum that may be reimbursed to the employee for lodging expenses.

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Prorated hotel room rate and taxes when they exceed the per diem

08/19/22	ROOM CHARGE	RP1214	239.94	187 on PSR (GSA)
08/19/22	Room Tax	RT1214	28.55	22.25
08/19/22	City Tax	CT1214	10.80	8.42
08/19/22	County Tax	741214	2.40	1.87

Prorated taxes based on \$187 max GSA lodging rate:

$(28.55/239.94) * 187 = 22.25$

$(10.8/239.94) * 187 = 8.42$

$(2.40/239.94) * 187 = 1.87$

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Ineligible Travel Costs

Alcohol or gratuities

Airfare costs that exceed coach class

Foreign travel without prior CPRIT approval

Travel outside of the grant contract effective dates

Employee traveling not listed on Personnel Level of Effort (PLOE)

Dates of travel occur outside of the employee's PLOE period (Travel Only Exception)

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Foreign Currency



Foreign currency travel expenses **must** be:

- converted to US dollar amounts before submitting to CPRIT, and
- documentation of the exchange rate used for the conversion **must** be included with supporting documents.

P&P Guide Reference:
10.4.4 International Travel Requires
Prior Approval

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Contractual Travel


Contractual Travel Costs	Required Support Documentation
Airfare	Itemized Amount
Mileage	Itemized Amount
Hotel	Itemized Amount
Meals	Receipts
Taxi/Uber	Receipts

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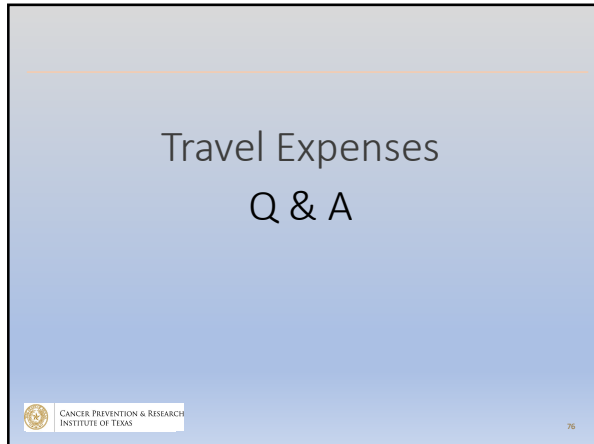
 **RECAP**

- Submit a **complete** travel expense report for each traveler and include all supporting documents
- Travel receipts should be in same order as GL
- Submit copy of GSA meals and lodging rates with supporting documents
- Submit foreign travel approval with supporting documents
- Convert foreign travel currency expenses to USD and include exchange rate used

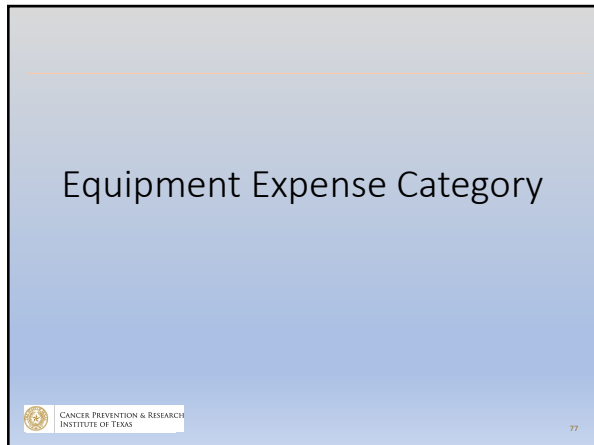
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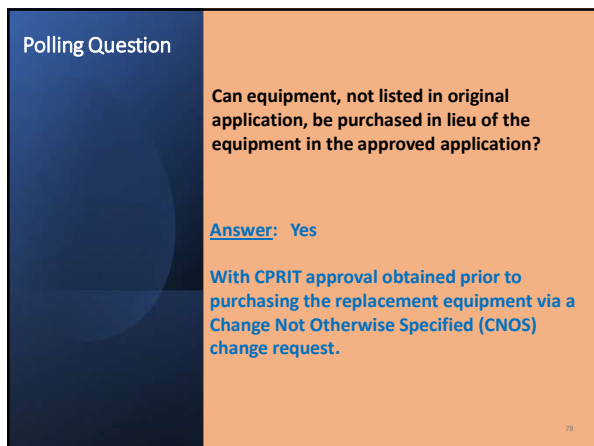
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Polling Question

Equipment service agreements cannot be purchased during a NCE.

Answer: False

Service agreements can be purchased but the cost must be prorated if the service agreement extends beyond the new end date of the grant.

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Equipment

For all equipment expenses, the grantee **must** include acceptable documentation of CPRIT approval.

Acceptable documentation includes:

- Initial Budget Justification with **equipment items highlighted**
- Approved change request

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Acceptable Equipment Documentation

Change Requests

Grant ID: [REDACTED]

Grant Title: [REDACTED]

PI/PO/CR: [REDACTED]

Organization: [REDACTED]

Grant Information

Contacts

Documents & Forms

Correspondence

Internal Review

Budget & Financial Status Reports

Progress Reports

Change Requests

Back to Change Requests

Change - Not Otherwise Specified

* Change Request Details:

I am requesting to rebudget funds allocated to subcontracts to purchase a tissue homogenizer, \$42,750.

* Justification:

The remaining equipment require a greater degree of F rates to be recovered from tumors and given under license from funding from our past animal contracts. For this reason, we require the equipment purchase of a homogenizer.

View/Hide Notes and Comments About This Document

2022-02-07 08:45: Complete Web Form: [REDACTED]

2022-02-07 08:45: Verify Information (pre-filled): [REDACTED]

2022-02-07 08:51: ASO Review (approved): [REDACTED]

2022-02-07 12:05: Grant Manager Review (approved) - Moon, Patty (Grant Manager)

2022-02-07 12:07: Contract Manager Review (approved) - Nelson, Lisa (Contract Manager)

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Acceptable Equipment Documentation

LINE	PART ID	DESCRIPTION	UM	TAX	QUANTITY	UNIT PRICE	EXTENSION
1	NS0001	NanoAssembler Spark Instrument	EA	R	✓ 1.0000	25,116.00	✓ 25,116.00
2		FREIGHT CHARGE	EA	N	0.0000	0.00	78.58

Detailed Budget for Year One

Other Direct Charges	
Travel	\$3,000
Equipment (Itemized)	
Funds are requested to upgrade several instruments to optimize manufacturing and to enhance efficiency: Precision NanoSystems NanoAssembler, Agilent TapeStation, Shaking Incubator, Oxford Nanopore Technology MinION (refer to budget justification for details).	\$50,000

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Matching Compliance Certification (MCC)



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Polling Question

Which items are allowable match expenses?

- A. Travel expenses that exceed the GSA per diem limit on hotel rates or meals
- B. Short-term travel visa fees and associated costs for an employee listed on the PLOE
- C. An employee's salary amount that exceeds CPRIT's \$200,000 cap
- D. Grantee professional association fees or dues
- E. None of the above
- F. All of the above

Answer: F


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Matching Compliance Certification (MCC)

- Institutions of Higher Education may use their Federal Indirect Cost Rate to fulfill match requirement
- Institutions of Higher Education **must upload to each grant record** most current indirect cost rate agreement
- If grantee uses a blended indirect cost rate calculation, grantee is **required** to have and follow a documented internal policy

P&P Guide Reference:
6.4 Matching Funds Certification and Verification



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MCC Support Documentation

Grantees must upload 100% of the supporting documentation when the MCC form is completed and uploaded to CGMS.

MCC will not be approved until all documentation is uploaded and reviewed by CPRIT.

The work must support, extend, or facilitate the CPRIT project in some way, even if it is not funded by CPRIT.

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MCC Required Support Documentation

Match Expenses Ledger

Invoices related to Match expenses

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MCC - Deficiency

A match deficiency may be carried forward and added to the matching fund requirement for the next project year so long as:

- Deficiency is equal to or less than 20% of the total matching funds required for the same period; and
- No prior matching funds deficiency



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MCC – Allowable Expenses (not an exhaustive list)

- Any expense that can be claimed for grant reimbursement
- Unrecovered indirect costs up to ten percent (10%) of the grant award amount (in addition to 5% indirect costs claimed for reimbursement) DOES NOT APPLY TO ACADEMIC INSTITUTIONS
- An employee's salary amount that exceeds CPRIT's \$200,000 cap
- Travel expenses that exceed the GSA per diem limit on hotel rates or meals
- Airfare costs that exceed coach class airfare
- Foreign travel related to CPRIT's funded project

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MCC – Allowable Expenses (not an exhaustive list)

- Taxes that are effectively user fees (hotel taxes, gasoline tax, or airfare tax)
- Short-term travel visa fees and associated costs for an employee listed on the PLOE
- Grantee professional association fees or dues (related to the CPRIT-funded project)
- Patent application fees and associated patent application preparation costs
- Moving costs of office furnishings or employees of companies relocating to Texas
- Security systems and ongoing security system monitoring fees for physical space

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Match
Certification



Grant funds for the next project year will not be distributed until the previous year's matching funds verification and certification for the upcoming year have been **approved**.

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Matching Compliance
Certification
Q & A




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No Cost Extensions
(NCE)



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No Cost Extension (NCE)

- There is no automatic approval. NCEs are based on several factors including;
 - documentation of progress
 - documentation that the work proposed for the NCE is consistent with the initial award
 - grantee must be in good fiscal and programmatic standing
- Approved NCEs
 - **The PI must exhibit measurable effort during an approved NCE**
 - The final report dates will change, but an additional annual report as well as quarterly reports are required until the contract ends

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No Cost Extension PLOE Update

The PLOE for NCEs needs to be updated because the extension time period defaults to zero.


Other Personnel	Level of Effort (LOE)	Year 1	Year 2	Year 3	Year 4	Total Person Months Per Person
Role on Project	Type App. (months)	0	0	12	12	
Program Coordinator	Effort on Project	0.00%	0.00%	100.00%	100.00%	
Person Months		0.00	0.00	12.00	12.00	12.00
Co-Program Director	Type App. (months)	0	0	12	12	
Effort on Project	0.00%	0.00%	0.00%	100.00%	100.00%	
Person Months		0.00	0.00	0.00	24.00	24.00
Project						
		0.00	0.00	24.00	12.00	
Person Months		0.00	0.00	24.00	12.00	24.00
Program						
		0.00%	100.00%	100.00%	100.00%	
Person Months		0.00	12.00	12.00	6.00	24.00
Co-Program Director	Type App. (months)	0	0	12	12	
Effort on Project	0.00%	0.00%	0.00%	100.00%	100.00%	
Person Months		0.00	0.00	6.00	6.00	6.00
Project Assistant	Type App. (months)	0	0	12	12	
Effort on Project	0.00%	0.00%	0.00%	100.00%	100.00%	
Person Months		0.00	0.00	6.00	6.00	6.00
NP/SCR	Type App. (months)	0	0	12	12	
Effort on Project	0.00%	0.00%	0.00%	100.00%	100.00%	
Person Months		0.00	0.00	6.00	6.00	6.00
Project Assistant	Type App. (months)	0	0	12	12	
Effort on Project	0.00%	0.00%	0.00%	100.00%	100.00%	
Person Months		0.00	0.00	6.00	6.00	6.00
Total Person Months Per Year		7.00	9.00	32.00	45.00	

Example of a NCE which resulted in a Year 4 – automatically populates with zeros

NCE – Frequently Asked Questions

What research can be conducted during an NCE?


Answer: Only scope of work items and associated aims and sub-aims that have been approved but have not yet been completed can be conducted during an NCE.

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Programmatic Topics

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Change of Approved Goals and Objectives



- Any changes to the scope of work or budget should be consistent with the guidance provided by reviewers and must be pre- approved by CPRIT through a Changes of Goals and Objectives request form.

P&P Guide Reference:
11.3 Goals and Objectives


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Prior written approval must be given by CPRIT for the purchase of all equipment, unless the specific piece of equipment was budgeted in the approved application or via a CNOS request.

Purchase of Equipment

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Prior written approval must be given by CPRIT for the transfer of an award to another Principal Investigator (PI).

Recruitment Awards are non-transferrable.

Change of PI/Co-Investigator

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Required documents for review:

- Context and justification for change
- Bio-sketch of proposed PI
- Resources (equipment, supplies, personnel) available to proposed PI
- Describe impact of change on the project goals and objectives, budget, key personnel, original timeline and CPRIT required reporting.
- Upload a revised budget and level of effort for all key personnel in an ad-hoc folder in CGMS


Change of PI/Co-Investigator

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Programmatic – Frequently Asked Questions

Do we need CPRITs prior approval to modify subcontractors and subcontract budgets listed on the original application?

Answer: Yes, if the award is a Multi-PI and the PI is at a different institution, and if the subcontractor is key personnel.



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Programmatic – Frequently Asked Questions

What are options to mitigate funding overlap between CPRIT and new Federal or Foundation Awards?

Answer: If there is a 100% overlap, a choice must be made between a CPRIT award and/or a Federal, Foundation Award.

With approval from the Federal project officer and CPRIT, one overlapping specific aim with a Federal award can be mitigated by eliminating the aim. The budget will be adjusted accordingly.

It is required that an applicant list all pending and current funding support, regardless of funder in all Academic Research applications.



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Contact Us

CPRIT's success is based on our funded research project successes.
Please contact us with your pre- and post-award questions.

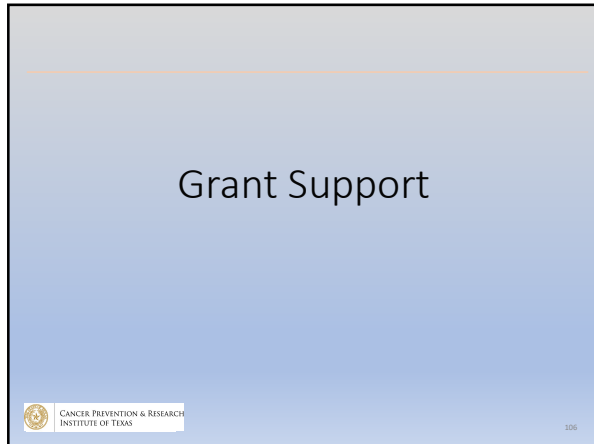
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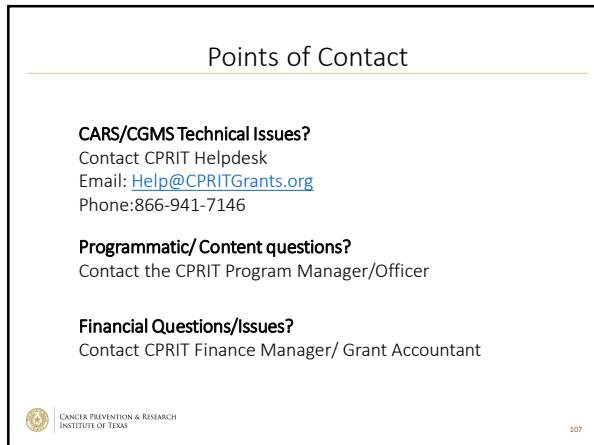
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CPRIT Grantee
Annual Compliance
Training
June 2023



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Academic Research

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